

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	No. 21 MC 101 (AKH)
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IN RE SEPTEMBER 11 LITIGATION	:	This document relates to :
	:	<i>Bavis v. United Airlines Inc.et al.</i> ,
	:	02 CV 7154
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**PLAINTIFF'S NOTICE OF MOTION
TO COMPEL PRODUCTION OF CD-ROM CONTAINING
POWERPOINT AND AUDIO/VISUAL PRESENTATION ENTITLED
"FAA TRANSNATIONAL THREAT TO CIVIL AVIATION"**

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Dated: August 5, 2011
Mount Pleasant, SC

PLEASE TAKE NOTICE that Plaintiff Mary Bavis, individually and as personal representative of the estate of Mark Bavis, moves this Court, at a date and time to be set by the Court, to compel the defendant, United Airlines, Inc., to produce for inspection and copying the original of the CD-ROM PowerPoint and audio entitled "FAA Transnational Threat to Civil Aviation" ("Transnational Threat CD"), which contains an audio and video presentation of terrorist threat assessment information that the FAA provided to United and hundreds of other members in the aviation industry between March and May 2001.

This plaintiff will rely upon the accompanying Memorandum of Law in support of this motion.

Dated: August 5, 2011

Respectfully submitted,

MOTLEY RICE LLC

By: /s/
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